## Exhibit D

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

JARROD STRINGER, et al.,

Plaintiffs,

No. SA-20-CV-46-OG v.

RUTH R. HUGHS, et al.,

Defendants.

VIDEOCONFERENCED DEPOSITION OF

THE CORPORATE REPRESENTATIVE OF

THE TEXAS DEMOCRATIC PARTY,

TOMMY GLEN MAXEY

Monday, April 27, 2020

VIDEOCONFERENCED DEPOSITION OF TOMMY GLEN MAXEY, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on Monday, April 27, 2020, from 10:03 a.m. to 2:04 p.m., before Debbie D. Cunningham, CSR, in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

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Q. (BY MS. MACKIN) Okay. And so I'm trying to get a list of the main activities of the Texas

Democratic Party. And so based on what you've said, it sounds like there is fundraising. There is candidate services. There is county services, voter protection, voter expansion, and maybe organizing. I mean, if you had to break it down into categories of activity, how would you do that, because I appreciate the explanation of kind of the departments and the structure?

A. Every day we communicate with voters. We educate voters. We help Texans who are not registered get them registered in myriads of ways to make sure that we expand the voting pool. We educate them how to cast a vote, when to cast a vote, where to cast a vote, and who to cast a vote for, pure and simple.

Our main goal right now is to register approximately 2.6 million people to vote, which we're spending lots of money on doing because the State of Texas is not following the federal law in registering people when they change their driver's license.

68 1 2 3 4 5 6 7 8 9 10 11 12 Ο. No, no, no, no. I'm talking about the link on 13 the Secretary of State's website where one can request 14 that a postage-paid application be mailed --15 A, have the computer to do that. But when you Α. get there, you can ask them, yes, to send you a form. 16 17 It is a laborious process. It takes a week or more for 18 people to get that piece of paper. Then they have to 19 fill it out and mail it in. 20 Often, we -- most people register -- I 21 mean, a considerable amount of people register in the 2.2 last weeks before the registration deadline. And asking 23 the Secretary of State to send a blank piece of paper to 24 you for you to fill out and then send back in, to get it 25 in before that deadline often causes, let's say, tens of

thousands of people not to make the deadline.

So we make a decision of sending a registration card in August to people that we know are not registered to vote already, for them to have convenience to fill it out. That's what you call "how you win an election." We don't wait for people to figure it out. We make it available to them so that they can take advantage of it by just filling in their personal data, signing it, putting it in a postage-paid envelope coming with the application.

In other words, we're not waiting for people to ask. We are sending people who are unaware that they need to register to vote because they have not been educated. Remember that voter education project? "Hey, you have to get on a registration list. We're not a state with automatic voter registration. I'm sure you vote -- you moved here from Washington, but you're not going to automatically be on the voter registration roles. So you need to fill out a piece of paper."

That's why we mail it to them and not just wait for people. If we waited for people, then the voter registration would be sorely lacking in Texas.

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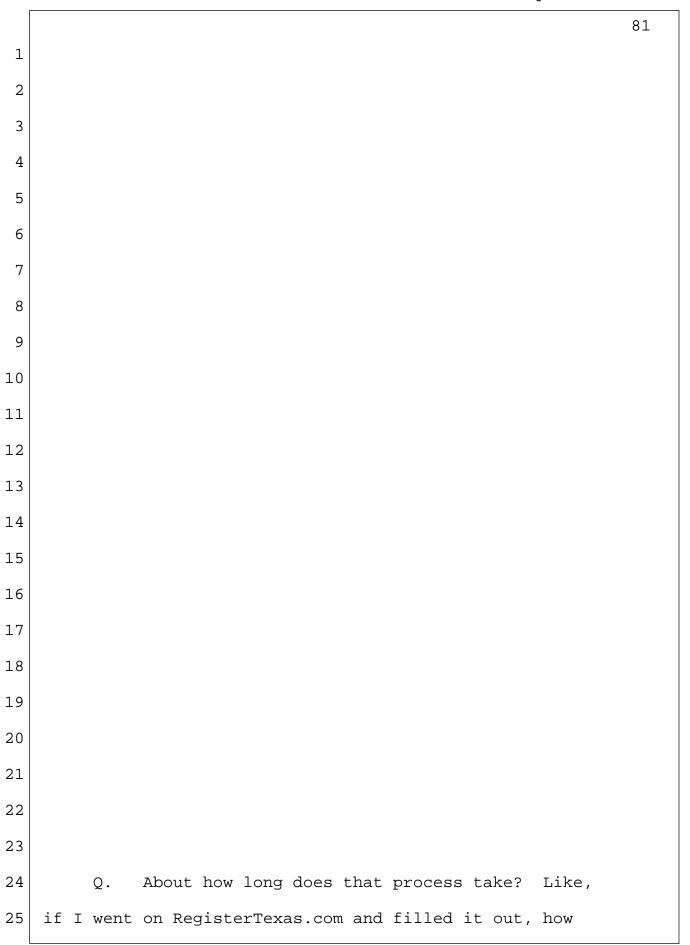
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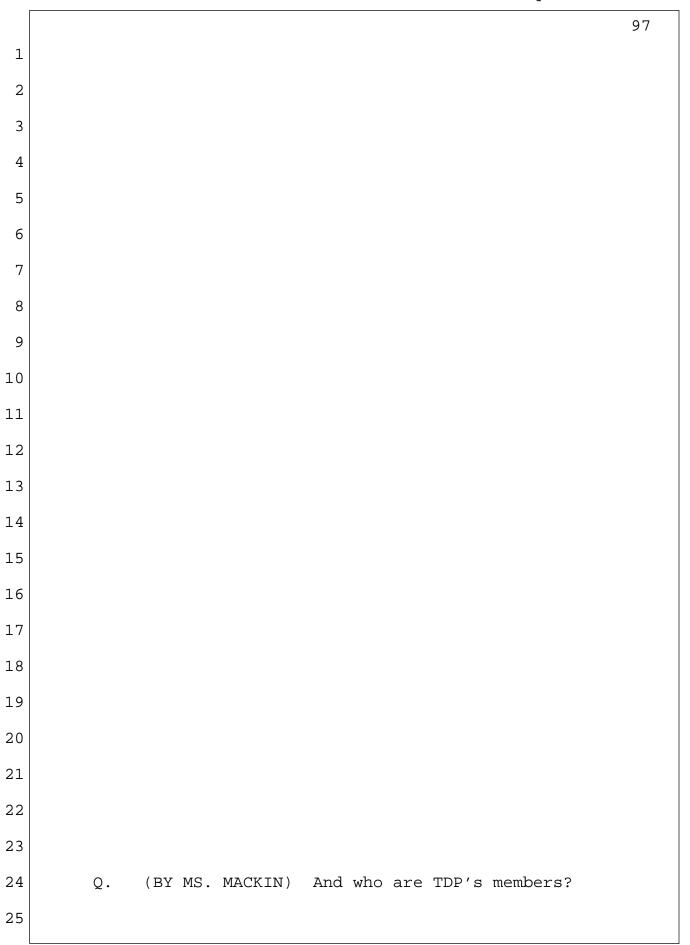
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long, approximately, would it be until I got my application in the mail to sign and then forward along in the postage-paid envelope? Ο. Okay. And most of this we wouldn't have to do if Α. people could update their registration when people got their driver's license updated. 



The Texas Election Code states that members of Α. a political party are the voters who cast a ballot in their primary election or sign an Affidavit of Affiliation with a Party -- it's spelled out in the Election Code -- with a Party officer. And so our members, in a legal sense, are approximately 2,084,000 Texans who voted in the March 3rd Democratic primary.